

1 HONORABLE THOMAS S. ZILLY
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 HUNTERS CAPITAL, LLC et al.,

12 Plaintiffs,

13 v.

14 CITY OF SEATTLE,

15 Defendant.

16 Case No. 20-cv-00983 TSZ

17 DECLARATION OF ERICA R. IVERSON
18 IN SUPPORT OF CITY OF SEATTLE'S RULE
19 702 MOTION TO EXCLUDE TESTIMONY
20 BY PLAINTIFFS' EXPERTS

21 I, Erica R. Iverson, declare as follows:

22 1. I am one of the attorneys representing the City of Seattle in this action. I am over
23 age 18, competent to be a witness, and making this declaration based on facts within my own
24 personal knowledge.

25 2. Attached as **Exhibit 1** is a true and correct copy of the Expert Rebuttal Report of
26 Jon M. Shane, Ph.D. in this matter dated June 2, 2022, excluding his appended CV.

27 3. Attached as **Exhibit 2** is a true and correct copy of an excerpt from City of Seattle's
28 Unopposed Motion for Court Approval of Revisions to Seattle Police Department's Use of Force
29 Policies, filed July 31, 2019 in Case No. 2:12-cv-01282 *United State of America v. City of Seattle*,
30 Dkt. No. 569. The full version of this publicly filed document was also produced in this matter

31 DECLARATION OF ERICA R. IVERSON IN SUPPORT OF
32 CITY OF SEATTLE'S RULE 702 MOTION TO EXCLUDE
33 TESTIMONY BY PLAINTIFFS' EXPERTS - 1
34 (Case No. 20-cv-00983 TSZ)

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under Bates number SEA_00240602–SEA_00240786.

4. Attached as **Exhibit 3** is a true and correct copy of the Expert Report of Seth Stoughton dated April 28, 2022, excluding his appended CV.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the deposition of Jon M. Shane, Ph. D. take in this matter on August 11, 2022.

6. Attached as **Exhibit 5** is a true and correct copy of the Expert Report of Dr. Eric L. Piza, Ph.D. dated April 27, 2022, excluding his appended CV.

7. Attached as **Exhibit 6** is a true and correct copy of the Expert Rebuttal Report of Dr. Charles C. Lanfear dated June 2, 2022.

8. Attached as **Exhibit 7** is a true and correct copy of excerpts from the deposition of Arik Van Zandt take in this matter on September 14, 2022.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts from the Expert Report of Arik Van Zandt dated April 28, 2022.

DATED this 2nd day of February, 2023, at Seattle, Washington.

s/Erica R. Iverson
ERICA R. IVERSON